

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 29, 2018

Mr. Mike Lamond, Administrator
Alpine Natural Gas
15 Saint Andrews Road, Suite 7
Valley Springs, CA 95252

GI-2018-03-ANG35

SUBJECT: General Order (GO) 112-F Gas Inspection of Alpine Natural Gas's Operation and Maintenance, and Emergency Plans, & Distribution Integrity Management Program.

Dear Mr. Lamond:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a General Order 112-F inspection of Alpine Natural Gas (ANG) from March 27 to March 30, 2017. During the inspection, SED reviewed the Comprehensive Standard Operation, Maintenance & Emergency Plan, Distribution Integrity Management Program (DIMP), and Operator Qualification program (OQ) of ANG's Distribution system. The inspection included a review of the operation and maintenance, and DIMP records for the years 2015 through 2017. A representative sample of the buried gas pipelines and aboveground services in ANG's service area were inspected for indications of leaks, construction activities, line markers, leak surveys, and odorization tests. SED staff also reviewed ANG's operator qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED's findings are noted in the Summary of Inspection Findings (Summary) which is enclosed with this letter. The Summary reflects only those particular records and procedures that SED reviewed during the inspection.

Within 30 days of your receipt of this letter, please provide a written response indicating the measures taken by ANG to address the violations and observations noted in the Summary.

If you have any questions, please contact Mohammad Ali at (916) 928-2109 or by email at ma5@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

Enclosure: Summary of Inspection Findings

SUMMARY OF INSPECTION FINDINGS

I. Probable Violations

Title 49 CFR §192.285(c) states in part:

“A person must be re-qualified under an applicable procedure once each calendar year at intervals not exceeding 15 months, or after any production joint is found unacceptable by testing under 192.513”

During the record review, SED identified that Matt Helm and Luke Frey had lapsed plastic joining qualifications while working on three distribution main construction projects and eight service line installations from 8/28/2016 to 10/25/2016. Matt and Luke were re-qualified for plastic pipe joining on 10/26/2016, but were not requalified in the 2017 calendar year, and have performed plastic joining for one distribution main construction project and four service installs in 2018.

SED determined that ANG violated 49 CFR §192.285(c) and failed to follow their own procedure 192.281-285 which states in part, “Alpine Natural Gas will internally re-train field personnel under the polyethylene pipe and fitting manufacturer joining procedure once each calendar year...” for qualifying personnel.

II. Areas of Concerns

1. Title 49 CFR §192.225(a) – Welding Procedures states in part: *“Welding must be performed by a qualified welder or welding operator in accordance with welding procedures qualified under section 5, section 12, Appendix A or Appendix B of API Std. 1104.....”*.

SED recommends ANG to include this requirement of qualifying the welding procedures as required by API Std. 1104 in Alpines procedure Maintenance 192-605(b)(1) Repair By Steel Welding.

2. During records review, SED observed that the “Design/Construction” section of ANG’s O&ME Manual does not indicate requirement for steel pipelines to be externally coated. Title 49 CFR §192.455(a) requires that buried or submerged pipeline installed after July 31, 1971 must have an external coating meeting the requirements of §192.461.

SED recommends that ANG include the requirement for external coating as required by §192.455(a).

3. During records review, SED identified that ANG’s –Procedure 303 Design/Construction does not include language for installing a Cathodic Protection (CP) system within a year after completion. Title 49 CFR §192.455(a) (2) states that buried or submerged pipeline installed after July 31, 1971 must have a cathodic protection system designed to protect pipeline installed and placed in operation within 1 year after completion of construction.

SED recommends that ANG include the requirement for CP system installation as required by §192.455(a)(2).

4. During records review, SED identified 45 feet of 6-inch main was abandoned on 9/21/2016. However, documents showing purging pipeline of gas as required by §192.727(b) were not available.

SED requests a copy of General Pipeline Repair Form 605, and a copy of the system map confirming the purging as indicated in Maintenance 727 of ANG OM&E manual.